

United States District Court

JUN - 4 2007

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SOUTHERN

DISTRICT OF

TEXAS

Michael W. Milby, Clerk
Laredo Division

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

V.

David Reyes
Laredo, Texas
United States

Case Number: L-07-MJ

906-1
-02Gloria Elena Reyes
Laredo, Texas
United States

(Name and Address of Defendants)

I, the undersigned complainant state that the following is true and correct to the best of my

knowledge and belief. On or about May 31, 2007 in Laredo, Texas Webb County, in

(Date)

the Southern District of Texas, David Reyes andGloria Elena Reyes defendant(s),

both United States Citizens, did unlawfully transport Mexican aliens Ana Luz Gonzalez Valera and Nely Yajaira Suarez San Cristobal by means of a motor vehicle within the Southern District of Texas knowing or in reckless disregard of the fact that said aliens had come to, entered, or remained in the United States in violation of law, and transported or moved said aliens within the United States by means of motor vehicle or otherwise, in furtherance of such violation of law.

in violation of Title 8 United States Code, Section(s) 1324 (a) (1) (A) (ii)I further state that I am a(n) Senior Border Patrol Agent and that this complaint is based on the

Official Title

following facts: based on statements of the accused and records of the Immigration & Naturalization Service.

Continued on the attached sheet and made a part of this complaint:

☒ Yes☐ No

Signature of Complainant

Luis Farias

Printed Name of Complainant

Sworn to before me and signed in my presence,

June 4, 2007

Date

at Laredo, Texas

City and State

Diana Saldana

U.S. Magistrate Judge

Name and Title of Judicial Officer

Signature of Judicial Officer

vs

David Reyes
Gloria Elena Reyes

[CONT OF BASIS OF COMPLAINT]

On May 31, 2007, a beige Buick Regal approached Border Patrol Agents at the Laredo North Border Patrol Checkpoint twenty-nine miles north of Laredo, Texas. The agents conducted an immigration inspection on the occupants of the vehicle. Three passengers stated they were United States Citizens and one was unable to answer the agent's questions. The vehicle was referred to secondary for further inspection.

In secondary, it was determined the driver and a male passenger, identified as Gloria Elena Reyes and David Reyes, respectively, were attempting to transport two citizens of Mexico who were in the United States illegally to San Antonio, Texas.

All subjects were placed under arrest, escorted into the checkpoint, and read their Miranda Rights.

Gloria Elena Reyes and David Reyes declined to give a statement regarding the case.

Furthermore, it was established by sworn statement given by Ana Luz Gonzalez Valera and Nely Yajaira Suarez San Cristobal both Mexican citizens who entered the United States illegally by wading the Rio Grande River that Gloria Elena Reyes and David Reyes knew they were in the United States illegally, harbored them in their home, and attempted to transport them to San Antonio, Texas.

Records checks revealed that David Reyes has an extensive criminal history and an outstanding warrant for his arrest in Austin, Texas.